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MEMO ENDORSED

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May 18, 2021

Hon. Judge Valerie E. Caproni
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

VIA E-MAIL AND ECF

Re: NATAS v. Multimedia Systems Design Inc., 20-CV-7269 (Caproni, J.)
Letter Motion to Seal Exhibit A to Joint Letter in Advance of Pretrial Conference

Dear Judge Caproni:

We represent the Plaintiffs in the above-referenced matter. This letter motion is filed jointly with Defendant/Counterclaim Plaintiffs in the above-referenced matter.

Pursuant to Federal Rule of Civil Procedure 5.2(d) and Your Honor's Individual Rule 5(B)(ii), the parties request the Court's leave to file under seal the Rough Transcript of the Rule 30(b)(6) Deposition of Defendant Multimedia System Design, Inc. dated May 17, 2021.

Sealing is appropriate because the document proposed for sealing is a rough deposition transcript of Defendant Multimedia Systems Design Inc., which is not in final form, may contain errors, and may become subject to confidentiality designations, which the parties have not yet discussed or agreed on. Accordingly, the circumstances favor sealing of this transcript. See *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119–20 (2d Cir. 2006).

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW
GARRETT & DUNNER LLP

JOHN H. SNYDER PLLC

/s/ Samuel V. Eichner

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Application GRANTED. Plaintiffs may file the transcript under seal. The Court reminds the parties that once the transcript is finalized, Plaintiffs must file it and make specific requests for sealing.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written above the printed name.

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

5/19/2021